

\*efiled 4/4/07

1 BARRY J. PORTMAN  
Federal Public Defender  
2 CYNTHIA C. LIE  
Assistant Federal Public Defender  
3 160 West Santa Clara Street, Suite 575  
San Jose, CA 95113  
4 Telephone: (408) 291-7753  
5 Counsel for Defendant TERAN

6  
7  
8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA, ) No. CR-07-00107 JF  
11 )  
Plaintiff, ) STIPULATION AND ~~PROPOSED~~  
12 ) ORDER CONTINUING HEARING  
vs. )  
13 )  
JOEL ANIBAL TERAN, )  
14 )  
Defendant. )  
15 \_\_\_\_\_)

16 **STIPULATION**

17 The parties hereby stipulate and agree that the initial district court appearance in the  
18 above-captioned matter, currently set for Wednesday, April 4, 2007, may be continued to  
19 Wednesday, April 18, 2007 at 9:00 a.m. The reason for the requested continuance is that the  
20 parties are awaiting approval of a 37-month offer pursuant to Rule 11(c)(1)(C) and the fast-track  
21 memorandum of understanding.

22 The parties further stipulate and agree that 14 days may be excluded from the time within  
23 which trial shall commence under the Speedy Trial Act, 18 U.S.C. §§3141(h)(8)(A) and  
24 (h)(8)(B)(iv), for the effective preparation of counsel.

1 Dated: April 2, 2007

2 s/\_\_\_\_\_  
3 CYNTHIA C. LIE  
4 Assistant Federal Public Defender

5 Dated: April 2, 2007

6 s/\_\_\_\_\_  
7 ERIC D. ROSEN  
8 Assistant United States Attorney

9 **[PROPOSED] ORDER**

10 Good cause appearing and by stipulation of the parties, it is hereby ordered that the initial  
11 district court appearance in the above-captioned matter shall be continued from April 4, 2007 to  
12 Wednesday, April 18, 2007 at 9:00 a.m.

13 It is further ordered that 14 days shall be excluded from the time within which trial shall  
14 commence under the Speedy Trial Act, 18 U.S.C. §§3141(h)(8)(A) and (h)(8)(B)(iv), as the time  
15 reasonably necessary for effective preparation of counsel.

16 Dated: April 3, 2007

17   
18 JEREMY FOGEL  
19 United States District Judge  
20  
21  
22  
23  
24  
25  
26